

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X

08 Civ. 7252 (PGG)

VLAD LYUBOVNY p/k/a “DJ VLAD,”

Plaintiff,

-against-

WILLIAM LEONARD ROBERTS II p/k/a “RICK ROSS,”

Defendant.

----- X

PARTIES’ JOINT LIST OF VOIR DIRE QUESTIONS

Plaintiff Vlad Lyubovny p/k/a “DJ Vlad” (“Plaintiff” or “DJ Vlad”) and Defendant William Leonard Roberts II p/k/a “Rick Ross” (“Defendant” or “Ross”), by their undersigned counsel, hereby submit the following joint list of voir dire questions.

In addition to general questions regarding the prospective jurors’ educational, employment and family background, the parties propose the following:

1. Have you ever heard of Vlad Lyubovny, “DJ Vlad” or VladTV? If so, in what context, and have you formed any opinions about them.
2. Have you ever heard of William Leonard Roberts, II, or “Rick Ross”? If so, in what context, and have you formed any opinions about him.
3. Do you believe that the fact that a lawsuit is being brought against the defendant, he must have done something wrong?
4. Are you aware of any media attention about this case?
5. Have you, close friend or member of your family ever been the victim of an assault?

6. Have you, close friend or family member ever been a plaintiff or defendant in a lawsuit? If so, describe the nature of the lawsuit. Also, were you satisfied with the outcome?
7. Have you, close friend or family member ever been a witness in a legal proceeding? If so, what type of proceeding?
8. Have you ever sat on a jury before? If so, what kind of case was it and did you reach a decision (without telling us that decision).
9. What kind of music do you listen to?
10. Do you listen to Rap/Hip Hop Music? If so, what type?
11. Do you have any opinion on so called "Gangsta Rap Music"? If so, what is that opinion?
12. Do you believe Rap/Hip Hop Music is entertainment?
13. What's your favorite type of movie?
14. What, if any, is your favorite sport?
15. What do you do in your spare time?
16. What, if any, organizations are you a member?
17. What was favorite subject in school?
18. What newspapers or magazines do you regularly read?
19. What, if any, news programs do you regularly watch?
20. Have you, close friend or any member of your family been involved in a physical or verbal altercation with more than two people? If yes, please explain?
21. Do you have any opinions about journalists or newscasters?

22. Do you believe that a journalist or newscaster has the right to report about other people's activities?

23. Do you have any friends in the media field or music industry? If so, in what capacity?

24. Have you ever worked in the media or music industry, and, if so, in what capacity?

25. Have you ever run for any elected position?

Dated: New York, New York
March 26, 2010

CAPLAN & ROSS, LLP

By: S/Brian D. Caplan
Brian D. Caplan, Esq.
Jonathan J. Ross, Esq.
100 Park Avenue, 18th Floor
New York, New York 10017
Phone: (212) 973-2376
Fax: (212) 661-4290
Attorneys for Plaintiff

DONALDSON, CHILLIEST &
MCDANIEL, LLP

By: S/Xavier Donaldson
Xavier Donaldson, Esq.
1825 Park Avenue, Suite 1102
New York, NY 10035
T: (212) 722-4900
F: (212) 722-4966
Attorneys for Defendant